

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of: Request of the Office of)
Regulatory Staff for Rate Relief to South)
Carolina Electric & Gas Company's Rates)
Pursuant to S.C. Code Ann. § 58-27-920)
_____)

DOCKET NO. 2017-305-E

PETITION TO INTERVENE OF AARP

AARP¹, by and through counsel, pursuant to R. 103-825 of the Commission's rules, respectfully petitions the South Carolina Public Service Commission ("Commission") for formal intervention as a party in the above-captioned matter. In support of this petition, AARP states as follows:

1. AARP, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has 617,000 members in South Carolina, many of whom are residential electric customers of South Carolina Electric & Gas Company ("SCE&G" or "Company").

2. AARP's interest in this matter and its grounds for intervention relate to the substantial significant impact on residential electric rates related to the rate reduction

¹In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members.

request by the Office of Regulatory Staff (ORS) in this docket. AARP desires to advocate on behalf of residential electric customers to ensure that rate relief that is prudent, fair, just and reasonable. More specifically, AARP's interest relates to how ORS' request, if granted, may provide potentially significant rate relief to those customers who are aged 50 and over. People aged 50 and over are impacted most directly by variations in energy prices. These consumers also devote a higher percentage of their total spending than do other age groups towards residential energy costs. Many older consumers also have special needs and safety concerns about their access to electric service. AARP wishes to ensure that residential energy customers, including those over age 50, receive their fair share of any reduction in the existing rate structure.

3. On September 26, 2017, a Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920 created this docket. AARP supports that request, as currently stated, for the reasons articulated in ORS's Motion. By granting the request of ORS, the Public Service Commission would be granting rate relief to AARP members that could have a positive impact on their lives. AARP believes that the Commission has an overriding obligation to fulfill this purpose and to protect the public by stopping SCE&G from continuing to collect revised rates on a failed project, and in line with the ORS request, return money to the ratepayers in the event the legislature or courts revise or overturn the Base Load Review Act.

SCE&G has been requesting and receiving rate increases for building this "power plant" since 2008. In all they have increased the residential rate by \$27.03, as part of an overall increase in revenue of \$445,000,978.00. This revenue has now been squandered

as SCE&G announced plans to scrap building the plant altogether. On August 1, 2017, SCE&G filed a notice of intent, Docket No. 2017-246-E, to seek a 10th consecutive annual rate increase under the Base Load Review Act, despite having already announced an intention to abandon the project. After a Motion to Dismiss by ORS as well as legislative and public outcry, SCE&G abandoned their notice of intent on August 15, 2017.

While AARP fully supports the current position of ORS, AARP would also reserve the right to address other significant issues that may arise during the course of this proceeding.

4. AARP's specific interest in this proceeding will not be adequately represented by other parties. AARP believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes. Moreover, AARP can assure that its intervention would not unduly delay the proceedings nor prejudice the rights of any other party.

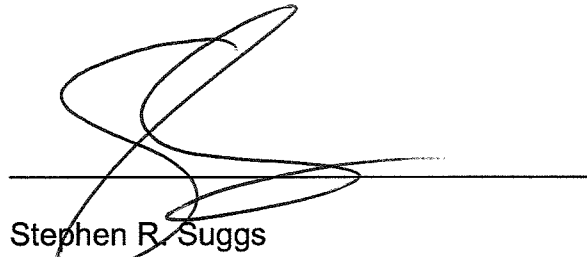
5. AARP is represented by the following counsel in this proceeding:

Stephen R. Suggs
South Carolina Appleseed Legal Justice Center
PO Box 7187
Columbia, SC 29202
(803) 779-1113

John B. Coffman (*pro hac vice* to be filed)
John B Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044

WHEREFORE, AARP respectfully requests that the Commission grant its Petition to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stephen R. Suggs', is written over a horizontal line.

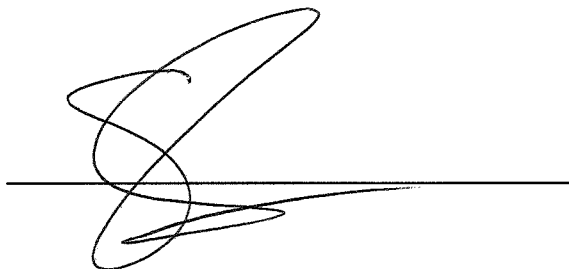
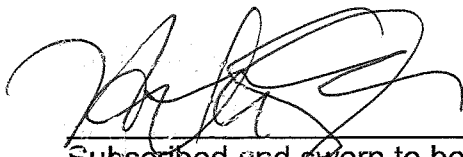
Stephen R. Suggs
South Carolina Appleseed Legal Justice Center
PO Box 7187
Columbia, SC 29202
(803) 779-1113

Attorney for AARP

Dated: October __, 2017

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to official service list in Docket No. 2017-305-E at the South Carolina Public Service Commission, on this 17th day of October, 2017.

A handwritten signature in black ink, consisting of a large, stylized 'S' or 'Z' shape with a horizontal line extending to the right.A handwritten signature in black ink, appearing to be 'H. Rhodes Shealey'.

Subscribed and sworn to before me
this 17th day of October, 2017.

HEATHER RHODES SHEALEY
Notary Public, State of South Carolina
My Commission Expires 6/24/2025